# DOCKET SECTION

## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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UNITED STATES POSTAL SERVICE RESPONSE TO PRESIDING OFFICERS
RULING NO. R97-1/42
(October 14, 1997)

The United States Postal Service hereby responds to Presiding Officer's Ruling No. R97~1/42, issued on October 10, 1997. Presiding Officer Ruling No. 42 directed the Postal Service to "submit a list of those library references it has announced the intention of offering as evidence, and the names of witnesses who will sponsor that evidence." As we understand the intent of this ruling, the following identifies those library references and associated persons specifically mentioned in pleadings previously filed by the Postal Service, or in comments made at hearings during the week of October 3, 1997.

Witness	Library Reference
Charles Crum	H-108 Standard Mail (A) Unit Costs by Shape H-144 Standard Mail (B) Parcel Post Mail Processing and Window Service Costs
Mark Smith	H-77 Development of Piggyback and Related Factors H-106 Mail Processing Unit Costs by Shape H-128 Coverage Factors for Letter and Flat Models H-129 DPS Volumes and Savings by Subclass and Category
Donald Baron	H-113 Productivities & Accept Rates for Mailflow Models
Michael Nelson	H-151 MLR Survey-Development and Data H-152 SPR Survey-Development and Data H-153 Expedited Mail Survey-Development and Data H-154 LDC24 Survey-Development and Data H-155 Express Mail Study H-156 MLR Survey-Programs and Output H-157 SPR Survey-Programs and Output H-158 Expedited Mail Survey-Programs and Output H-159 LDC24 Survey-Programs and Output

Paul Seckar H-134 Materials in Support of Periodicals Mail Processing Cost

Testimony, USPS-T-26 H-169 FSM-1000 Field Test

Philip Hatfield H-130 1997 OCR/RBCS Accept and Upgrade Rates

Carl Degen H-146 MODS-Based Costing, Description of Workpapers and SAS

Programs

H-185 First-Class Mail Characteristics Survey

Sharon Daniel H-112 Non-Standard Surcharge

H-131 Arrival and Barcoding Profiles of Parcel Post, DBMC, and

Special Rates Parcels

H-132 BMC Productivity and Dispatch Profile

Michael McGrane H-109 Standard Mail (A) Mail Processing ECR Costs

H-182 Standard Mail (A) Unit Cost by Weight Increment

In addition, the Postal Service anticipates that other library references associated with the testimony of witnesses who have already appeared for cross-examination, or have yet to appear, may be identified by parties, the Presiding Officer, or the Commission as requiring clarification as to status or sponsorship. The following lists those library references for which the Postal Service is currently prepared to provide witnesses, together with the names of individuals who would testify or appear for cross-examination.

#### Witness

# Library Reference

William Takis H-183 Documentation of Incremental Costs of Load Time

H-184 Documentation of Single-Subclass Ratios

H-198 Documentation of Piggyback Ratios Used in Incremental Cost

Analysis

H-199 Linked Electronic Version of Takis Workpapers

Paul M. Lion H-188 Materials Supporting Post Office Box Analysis

H-254 Materials Supporting Responses to OCA/USPS-T24-65(i)

David Treworgy H-114 Distribution of Priority Mail Volume into Delivery Method

H-247 Material Responsive to Interrogatory OCA/USPS-T12-38

Donald Baron H-136 Creation of Data File TPANL96. Weight. Disk

H-137 Description of Methods for Estimating Load Time Elasticities

for City Carrier Letter Routes H-138 The Actual Stops Model

H-139 The Actual Deliveries Model

H-140 Calculation of Fixed Time Per Stop

H-141 The Quadratic Model for Estimating Running Time

Elasticities

H-142 The Quadratic Model With Interactions for Estimating

Running Time Elasticities

H-143 Calculations of Fiscal Year 1996 Average CCS
H-189 Documentation of Rural Carrier Cost Development
H-225 Measuring the Effects of New Deliveries on Load Time
H-289 The Calculation of an Alternative Elasticity in Response to

UPS/USPS-T17-14

Marc Smith H-111 Dropship Savings for Periodicals and Standard (A)

Dan Talmo H-105 Standard (A) Regular Rate Mail Characteristics Study

H-190 Second-Class Mail Characteristics Survey

H-195 Standard (A) Nonprofit Rate Mail Characteristics Study

The Postal Service is also in the process of inquiring about availability of individuals who would be in a position to testify as to other library references that might be identified subsequently during hearings or otherwise.

In identifying these documents and individuals, the Postal Service takes no position at this time as to the status that might be deemed to be required under Commission rules or other applicable law.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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By its attorney:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2989; Fax -5402 October 14, 1997

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Daniel J. Foucheaux, Jr.

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 October 14, 1997